

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: C.R. BARD, INC. PELVIC REPAIR
SYSTEM PRODCUTS LIABILITY
LITIGATION

MDL NO. 2187

IN RE: AMERICAN MEDICAL SYSTEMS,
INC., PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2325

IN RE: BOSTON SCIENTIFIC, PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2326

IN RE: ETHICON, INC. PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2327

IN RE: COLOPLAST PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2387

IN RE: COOK MEDICAL, INC, PELVIC
REPAIR LIABILITY LITIGATION

MDL NO. 2440

IN RE: NEOMEDIC PELVIC REPAIR SYSTEM
PRODUCT LIABILITY LITIGATION

MDL NO. 2511

This Document Relates To All Cases

**LANA C. KEETON MOTION FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT
OF OBJECTIONS TO THE RECOMMENDED ALLOCATION OF COMMON
BENEFIT FEES AND THE REIMBURSEMENT OF SHARED EXPENSES AND HELD
COSTS BY THE COURT APPOINTED EXTERNAL REVIEW SPECIALIST**

The undersigned moves the Court for leave to file a Reply Brief in Support of Objections to the Recommended Allocation of Common Benefit Fees and the Reimbursement of Shared Expenses and Held Costs by the Court Appointed External Review Specialist ("Recommended Allocation") pursuant to Local Rule 7.1.

Pretrial Order #332 does not address reply briefs, however Local Rule 7.1(a)(7) provides for the filing of reply briefs within seven days of service of a response to a motion, and only requires the Court's leave for a surreply. Keeton respectfully submits that good cause exists here in light of the import and scope of the issues presented to allow the filing of a reply brief in accordance with the Local Rule.

A reply brief is necessary, as the FCC's response brief raises numerous factual issues, including issues not raised prior, that require clarification or outright correction, as well as legal argument and case citations that Lana Keeton has not had an opportunity to address. The record is not complete and is misleading without Lana Keeton's clarifications and corrections of the record, as well as responses to completely incorrect arguments presented by the FCC for the first time in their response brief.

It appears to violate Keeton's right to Due Process under the 5th/14th Amendments and violate the fairness of these proceedings, if Lana Keeton is not provided the opportunity to reply to the invalid arguments and factually incorrect assertions made by the FCC in its response brief.

Based on the foregoing, and for good cause shown, Keeton respectfully moves the Court for leave to file a Reply Brief in accordance with Local Rule 7.1, to be filed by April 15, 2019.



As today is the 15th of April, Keeton is also filing her Reply Brief at the same time. Keeton prays

The court will grant this Motion for Leave to file a Reply Brief and accept the Reply Brief itself.

Dated: April 15, 2019

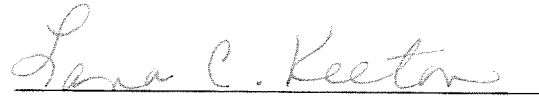
Miami Beach, Florida 33139

Respectfully,


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via Federal Express this 15th day of April 2019 on all counsel or parties of record by filing it with the Clerk of the Court.



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